

**UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**CAREY E. STRONACH,**  
*Plaintiff,*

**v.**

**CA No. 3:07cv646**

**VIRGINIA STATE UNIVERSITY, et al.,**  
*Defendants.*

**MOTIONS IN LIMINE**

Defendants, Virginia State University (VSU), Eddie N. Moore, Jr. (Moore), W. Eric Thomas (Thomas), Larry C. Brown (Brown) and Ralph C. Gatrone (Gatrone) (collectively Defendants), by counsel, submit these Motions *in Limine*.

Defendants ask that the District Court in anticipation of trial of this case:

- 1. Exclude Mention of a Verbal Argument Between Stronach and Thomas at Thomas' Deposition;**
- 2. Exclude Mention of Any Sexual Harassment Lawsuit in Which Gatrone Was a Defendant;**
- 3. Exclude Testimony Regarding an Alleged "You People" Comment;**
- 4. Exclude the Content of Stronach's Testimony in Other Lawsuits;**
- 5. Exclude Past or Current "Victim" Plaintiffs From Testifying in This Matter as Their Testimony is Irrelevant and Unfairly Prejudicial;**
- 6. Exclude Academics From Testifying in this Matter as Their Testimony is Irrelevant and Wholly Unnecessary and a Waste of Time;**
- 7. Exclude Conclusory Testimony with Respect to Emotional Injury as Wholly Speculative;**

8. **Exclude Witness Testimony, Lay or Medical, From Speaking of the “Cause and Effect” Without a Proper Foundation**
9. **Exclude Writings Authored By the Late Dr. M. Hadi Moadab; and**
10. **Exclude Stronach’s Distorted Notions of “Free Speech”.**

Defendants’ reasons are more fully discussed in the attached Memorandum in Support of their Motions *in limine*.

Respectfully submitted,

**VIRGINIA STATE UNIVERSITY,  
EDDIE N. MOORE, JR., W. ERIC  
THOMAS, RALPH C. GATRONE, AND  
LARRY C. BROWN**

By \_\_\_\_\_/s/\_\_\_\_\_  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 16th day of April 2008, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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